TOS-9202-007
EOH0954CAA

A. SPCC FIELD SHEET
(To be completed if SPCC Regulation is applicable to Facility - See 40 CFR 112.1)

1a. NAME OF FACILITY Go - Jo Industries	**1b. TYPE OF FACILITY** Manufacture cosmetics, hand cleaner and soap
1c. FACILITY LOCATION 3783 State Road, Cuyahoga Falls, Summit County, Ohio 44223-2698	
2a. NAME OF OWNER AND/OR OPERATOR RESPONSIBLE FOR FACILITY Jerome Lippman	**2b. TELEPHONE NUMBER** (216)920-8100
2c. MAILING ADDRESS P.O. Box 991, Akron, Ohio 44309-0991	
3. TYPES OF OIL STORED AND CAPACITY OF ABOVEGROUND AND BURIED STORAGE (SEE ATTACHED PAGE)	
4. IS A CERTIFIED SPCC PLAN AVAILABLE FOR INSPECTION? [X] YES [ ] NO	**5. DATE OF INSPECTION** March 3, 1992
6. NAME AND REGISTRATION NUMBER OF CERTIFYING ENGINEER [ ] NOT AVAILABLE William J. Bandy, Jr., P.E., registration number E-35178	**7. DATE SPCC PLAN WAS CERTIFIED** [ ] NOT AVAILABLE April 24, 1981
8. IS THE SPCC PLAN FULLY IMPLEMENTED? [ ] YES [X] NO [ ] NOT APPLICABLE	
9. NAME OF WATER BODY THAT POTENTIAL SPILL COULD ENTER: OR IF UNNAMED TRIBUTARY, THEN FIRST WATERBODY DOWNSTREAM Unnamed tributary to Mud Brook and wetlands.	
10. COMMENTS (SEE ATTACHED PAGE)	

11a. SPCC NO.	**11b. CASE NO.**	**11c. NPDES NO.** [ ] NOT AVAILABLE

12a. INSPECTOR (sign)	**12b. DATE** March 3, 1992
12c. INSPECTOR (print) Anne A. Busher, Ecology & Environment, Inc.	George M. Albertson, Ecology & Environment, Inc.

A. SPCC FIELD SHEET (attachment 1)
3. TYPES OF OIL STORED AND CAPACITY OF ABOVEGROUND AND BURIED STORAGE

TANK NO.	CONTENTS	CAPACITY (GAL.)
2A	AMINE TANKS	6,000
3A	AMINE TANKS	6,000
4A	PROPYLENE GLYCOL	6,000
11A	PROPYLENE GLYCOL	4,000
12A	PROPYLENE GLYCOL	7,500
13A	DETERGENT	4,800
14A	DETERGENT	5,000
6B	TALL OIL	12,000
7B	TALL OIL	12,000
8B	TALL OIL	12,000
9B	PETROLATUM	4,300
10B	PETROLATUM	4,300
11B	DETERGENT	6,500
11C	SEAL OIL	20,000
12C	SEAL OIL	20,000
13C	SEAL OIL	20,000
14C	DETERGENT BLENDS	20,000
15C	DETERGENT BLENDS	20,000
1D	STODDARD SOLVENT	20,000
2D	STODDARD SOLVENT	20,000
3D	STODDARD SOLVENT	20,000
4D	STODDARD SOLVENT	20,000
5D	STODDARD SOLVENT	20,000
6D	STODDARD SOLVENT	20,000
7D	STODDARD SOLVENT	20,000
8D	ODORLESS MINERAL SPIRITS	20,000
9D	ODORLESS MINERAL SPIRITS	15,000
10D	ODORLESS MINERAL SPIRITS	15,000
11D	ODORLESS MINERAL SPIRITS	15,000

TANKS 2A THROUGH 15C ARE INSIDE FACILITY
TANKS 1D THROUGH 11D ARE OUTSIDE FACILITY
TANKS 5A THROUGH 10A ARE 20,000 GAL. DEACTIVATED

A. SPCC FIELD SHEET (attachment 1)
10. COMMENTS

Changes in the facility have been made since 1981, when the plan was last formally reviewed by a certified engineer. The plan was originally put together as a design for spill prevention and Kathryn A. Holen, the environmental and safety manager for the Go-Jo Industries facility verbally indicated on March 3, 1992 that the plan had been fully implemented. However, changes made in the design of containment systems and subsequent removal of tanks from service were not mentioned in the SPCC plan. The entire facility perimeter is surrounded by a fence. A cinder block brick wall was used as the material for the dikes and cement was used as material for the floor of the dikes. All tanks are above ground. None of the tanks at the facility had liquid level sensing devices of high level alarms. No gauges were apparent on any of the tanks addressed during the inspection. Ms. Holen indicated that tanks are manually measured by GoJo Receiving Department Personnel, prior to receipt of a delivery. Postings of Emergency Phone Numbers were not observed by the inspectors, however, Ms. Holen said they were posted.

The north side tank area has been radically modified since the SPCC plan was written. The original plan addresses underground tanks, presently all tanks are above ground and contained with a cinder block dike wall. The plan does not address or discuss these modifications to the facility. The plan also does not discuss any changes to the contingency in the event of a spill in that area. The north side tank area was very well lighted. The entire tank farm was diked with a cinder block wall and then surrounded by a 15ft chain link fence. The fill ports for the tanks are located outside of the diked wall and outside the fence, allowing access by facility personnel. Tank valve shut-offs are in the closed position at all times according to Ms. Holen and were closed at the time of the inspection. Each of the access caps to the fill ports are capped and locked to prevent accidents, however one of the caps was unlocked during our inspection. The concrete floor of the diked tank farm was free of oil stains and contained an inch or so of rain water. Along the northern most edge of the diked area was a grate, which is part of the drainage system for the enclosure. According to Ms. Holen, the drain is closed at all times. The water in the drainage grate appeared to be clear and free of a sheen. The water that collects in the grates is periodically inspected and then allowed to drain into the storm sewers on site. According to Ms. Holen in the event of a catastrophic failure of a tank, the oil would be held by the dike until a vacuum truck could arrive. Approximately 20-30 ft from the truck unloading pad and the tank fill ports was a sewer. The pad does not have any diking around the pad to prevent material from entering the sewer in the event of a spill. According to Ms. Holen, the sewer was a sanitary sewer, however, the SPCC plan indicates the sewer as a storm sewer. No structural containment was present around the sewer, however, the

facility had some booms in a drum available, by the nearest plant entrance. According to Ms. Holen, plant delivery personnel are aware of the booms.

The south side unloading and storage area consists of a tank storage area inside the facility with tank fill ports and the truck unloading pad located outside. Inside the facility are two separately diked storage areas, each is contained with a cinder block wall approximately 3 ft high. The first storage area consists of five 20,000 gallon horizontal tanks. The second storage area contains 19 storage tanks. Six of these tanks were deactivated and according to Ms. Holen, to eventually be removed. Each tank in-use has a shut-off valve. All tanks in operation had their valves closed and were tagged shut. The concrete floor of the diked areas were relatively clean and valves and pipes appeared to be free of leaks. The lighting inside the plant near the storage area was adequate. The dikes surrounding the tanks located inside the facility on the south side are not mentioned in the SPCC plan. Sorbent pads and boom material were available near one of the plant exits. The fill ports and lock caps for the tanks inside the building were located along the outer south wall of the facility. The truck unloading pad on the south side of the building was adjacent to the fill ports for the tanks. All active tank fill ports were capped and locked according to GoJo's standard procedures indicated by Ms. Holen. However, the fill ports for four inactive tanks were uncapped and unlocked. The piping for the inactive tanks were visible inside the plant and Ms. Holen was unsure whether they were capped or sealed, however, shutoff valves were in the closed position. The fill ports for the tanks are well marked, however, they are not well protected from collisions. The facility SPCC plan even mentions "that this area has the highest potential for a spill emergency". The SPCC plan also says that "without modification to the unloading area, a large spill could reach the storm sewer". No modifications appeared to have been made to the unloading area since the plan had been written. Inside of the plant as well as in the tank storage areas are floor grates. According to Ms. Holen, the grates in the plant as well as in the containment area, if breached automatically drain into a 150,000 gallon containment pond at the back of the facility property. It is unclear what the mechanism for the overflow to the grates would be to trigger the drainage into the containment pond in the event of a spill.

The containment pond located at the back of the facility is not mentioned as part of the contingency for the facility in the SPCC plan. It is unclear exactly when the pond was constructed and whether it operated correctly. At the time of the inspection, there was rain water with an oily sheen in the pond. Also at the back of the facility is the storm drain discharge which empties into as small tributary of Mudbrook. This storm drain collects and discharges all the run-off from the facility which enters storm sewers on the property. The discharge appeared to be foamy and had a slight sheen.

B. SPCC INSPECTION SUMMARY SHEET

SPCC NO.	CASE NO.	DATE OF INSPECTION March 3, 1992
NAME OF INSPECTOR (signature) Anne A. Busher / George M. Albertson		DATE OF DOCUMENTATION REPORT March 11, 1992
NAME OF INSPECTOR (print) Anne A. Busher	George M. Albertson	NPDES NO. Not applicable

1. FACILITY

a. COMPANY Go-Jo Industries		
ADDRESS 3783 State Road		TELEPHONE (216)920-8100
CITY Cuyahoga Falls	STATE Ohio	ZIP CODE 44223-2698
FACILITY NAME Go-Jo Industries		
b. FACILITY LOCATION 3783 State Road		
PARENT CORPORATION Go-Jo Industries		
ADDRESS 3783 State Road		
CITY Cuyahoga Falls	STATE Ohio	ZIP CODE 44223-2698
c. WATER BODY PROTECTED Unnamed tributary to Mud Brook		

2. PURPOSE

INITIATION: [X] Routine Surveillance [ ] Coast Guard Information
[ ] Spill Report [ ] Citizen Information [ ] Other (specify):

TYPE: [X] Plan Preparation [X] Plan Implementation
[ ] Follow-up [ ] Plan Amendment

3. INSPECTION

INDIVIDUAL CONTACTED Kathryn A. Holen	TITLE Environmental and Safety Manager
INDIVIDUAL CONTACTED	TITLE
NOTIFICATION	

B. SPCC INSPECTION SUMMARY SHEET (page 2 of 2)

4. FINDINGS

SOURCE IN APPARENT COMPLIANCE WITH SPCC REQUIREMENTS:

[ ] Yes
- [ ] Have adequate plan
- [ ] Not subject to regulations
  - [ ] Insufficient storage
  - [ ] No reasonable spill expectation
- [ ] Plan fully implemented
- [ ] New facility operational for less than 6 months

[X] No
- [ ] No plan
- [ ] Plan not properly certified
- [ ] Plan does not have management approval
- [ ] Plan not maintained at facility manned 8 hrs/day
- [X] Inadequate plan (detailed SPCC Plan review attached)
- [X] Plan not fully implemented
- [X] Plan not reviewed within 3 years

[ ] Other

5. ATTACHMENTS
(None required if facility is in apparent compliance)

	NONE	ATTACHED	ALREADY ON FILE
*Detailed Observations	[ ]	[X]	[ ]
*Photographs	[ ]	[X]	[ ]
Slides	[X]	[ ]	[ ]
Map	[ ]	[X]	[ ]
*Field Drawing	[ ]	[X]	[ ]
*Comments	[ ]	[X]	[ ]
Telephone Conversations	[X]	[ ]	[ ]
*SPCC Plan	[ ]	[X]	[ ]

*(ALL REQUIRED IF FACILITY IS NOT IN APPARENT COMPLIANCE. If photos not permitted, check "None" and explain. Add "SPCC Plan" to List of Attachments when appropriate.)

C. DETAILED SPCC DOCUMENTATION	
FACILITY Go-Jo Industries	**DATE OF INSPECTION** March 3, 1992

1. FACILITY DESCRIPTION

1a. TYPE OF BUSINESS/OPERATION
Manufacturer of cosmetics, hand cleaners and soaps; bulk storage of raw materials.

1b. FACILITY OIL STORAGE

TANK NO.	CONTENTS	CAPACITY (GAL.)
2A	AMINE TANKS	6,000
3A	AMINE TANKS	6,000
4A	PROPYLENE GLYCOL	6,000
11A	PROPYLENE GLYCOL	4,000
12A	PROPYLENE GLYCOL	7,500
13A	DETERGENT	4,800
14A	DETERGENT	5,000
6B	TALL OIL	12,000
7B	TALL OIL	12,000
8B	TALL OIL	12,000
9B	PETROLATUM	4,300
10B	PETROLATUM	4,300
11B	DETERGENT	6,500
11C	SEAL OIL	20,000
12C	SEAL OIL	20,000
13C	SEAL OIL	20,000
14C	DETERGENT BLENDS	20,000
15C	DETERGENT BLENDS	20,000
1D	STODDARD SOLVENT	20,000
2D	STODDARD SOLVENT	20,000
3D	STODDARD SOLVENT	20,000
4D	STODDARD SOLVENT	20,000
5D	STODDARD SOLVENT	20,000
6D	STODDARD SOLVENT	20,000
7D	STODDARD SOLVENT	20,000
8D	ODORLESS MINERAL SPIRITS	20,000
9D	ODORLESS MINERAL SPIRITS	15,000
10D	ODORLESS MINERAL SPIRITS	15,000
11D	ODORLESS MINERAL SPIRITS	15,000

TANKS 2A THROUGH 15C ARE INSIDE FACILITY
TANKS 1D THROUGH 11D ARE OUTSIDE FACILITY
TANKS 5A THROUGH 10A ARE 20,000 GAL. DEACTIVATED TANKS

1c. PREVENTION MEASURES PROVIDED

Some of the secondary containment measures provided were the dikes, oil absorbing materials, booms and shut-off valves. The dikes drain toward drain tiles which drain to a retention pond with a total approximate capacity of 150,000 gallons.

1d. APPEARANCE OF FACILITY (housekeeping)

The facility appeared to be orderly and well maintained.

1e. PAST SPILL HISTORY

There have been no major spills at the Go-Jo Industries facility.

C. DETAILED SPCC DOCUMENTATION

2. RECEIVING WATER (should spill occur)

2a. NAME AND/OR DESCRIPTION

Mud Brook and wetlands.

[X] Perennial [ ] Intermittent
[ ] Water present at time of inspection
[ ] Inspector traced discharge to receiving water
[ ] Inspector traced apparent drainage path to receiving water
[ ] Receiving water identified by company representative
[X] Receiving water identified from topo map
[ ] Receiving water identified by other means (specify):

2b. PROBABLE FLOW PATH TO RECEIVING WATER

Unnamed tributary to Mud Brook.

2c. CLIMATIC INFORMATION

C. DETAILED SPCC DOCUMENTATION

3. COMMENTS

On March 3, 1992, Anne Busher and George Albertson of the Technical Assistance Team (TAT) conducted an SPCC inspection at the Go-Jo Industries facility located at 3783 State Road, Cuyahoga Falls, Summit County, Ohio. Kathryn A. Holen, Environmental and Safety Manager for the facility, was present during the inspection.

The Go-Jo Industries facility consists of several horizontal above ground storage tanks ranging in size from 15,000 gallons to 20,000 gallons which are located outside the facility. The facility also has several horizontal above ground storage tanks located inside the facility which range in size from 4,000 gallons to 20,000 gallons. The facility is manned 5 days a week, 24 hours per day. The plant is not operational on Saturday and Sunday, unless work load necessitates. According to Ms. Holen, there is no security personnel at the facility during the weekend, however GoJo has a security system. Spills which occur on Saturday or Sunday potentially can go unnoticed until first shift on Monday.

Ms. Busher and Mr. Albertson found that there was an SPCC plan at the facility available for review for the raw materials storage tanks. The plan was certified by a professional engineer, William J. Bandy, Jr., registration number E-5178 on April 23, 1981. The facility is covered by one SPCC plan. The plan did not reflect the changes made at the facility since its original certification in 1981. The plan did include a contingency plan for identifying a spill incident, the notification which included a list of phone numbers for response contractors, the Environmental Protection Agency, local fire department and the United States Coast Guard National Response Center. According to the plan the persons discovering the spill should contact the Spill Control Coordinator. No names or telephone numbers were present in the plan for the designated Spill Control Coordinators. Training records for GoJo personnel on the SPCC spill contingency procedures was not available for review. According to Ms. Holen, GoJo receiving and mixing personnel are knowledgeable of the SPCC spill notification procedures, however it was unclear whether all GoJo employees are familiar with the procedures.

The plan does identify Mud Brook as the receiving waters, and indicated that the storm sewers eventually empty into Mud Brook.

The North side unloading and storage area has changed so radically that the plan does not reflect the tank storage area, the truck unloading pad, or the dikes.

The South side unloading and storage area has also changed, the changes are not as apparent because the map provided in the plan

does not indicate the tank locations and there individual contents. Changes to containment structures and control and counter measures are apparent around the tanks. Changes to the truck unloading pad and the tank fill ports appears to remained structurally the same, however a number of tanks have been removed from service. A list of the general raw materials stored on the south side are presented however, no detailed list of tank contents is available.

After comparison of the inspection findings to the SPCC plan, it has been determined that the SPCC plan has not been fully implemented.

4. SPCC PLAN REVIEW

During the SPCC plan review, a number of discrepancies were discovered between the plan and the inspection of the facility. The current SPCC plan has never been reviewed since its certification in 1981 and has never been updated to reflect changes made at the facility. The changes in the outdoor containment area on the north side have not been addressed in the SPCC plan. The underground storage tanks are covered in the plan although they are no longer in use at the facility. Ms. Holen verbally indicated during the inspection that the tanks have been removed. The plan did not list materials stored on site or the size and location of the tanks. The plan is deficient in the outlining any prevention measures to assure a spill would not reach the storm sewers located near the south and north truck unloading pads.

5. SPCC AMENDMENT RECOMMENDATIONS (AMENDMENT INSPECTIONS ONLY)

After the inspection and review of the GoJo facility and the SPCC plan, the following suggestions are recommended:

1) Amend the SPCC plan to reflect all changes made at the facility since its certification in 1981. Some of the changes that should be addressed in the plan are the 11 outdoor above ground storage tanks, the removal of the underground storage tanks, the dikes around the tanks inside the facility and outside, and the addition of the retention pond.

2) The plan must be reviewed by a certified engineer following all major changes to the facility and then every three years.

3) The plan does not provide names of the materials stored in tanks, the size of the tanks and a floor plan indicating the location of those tanks.

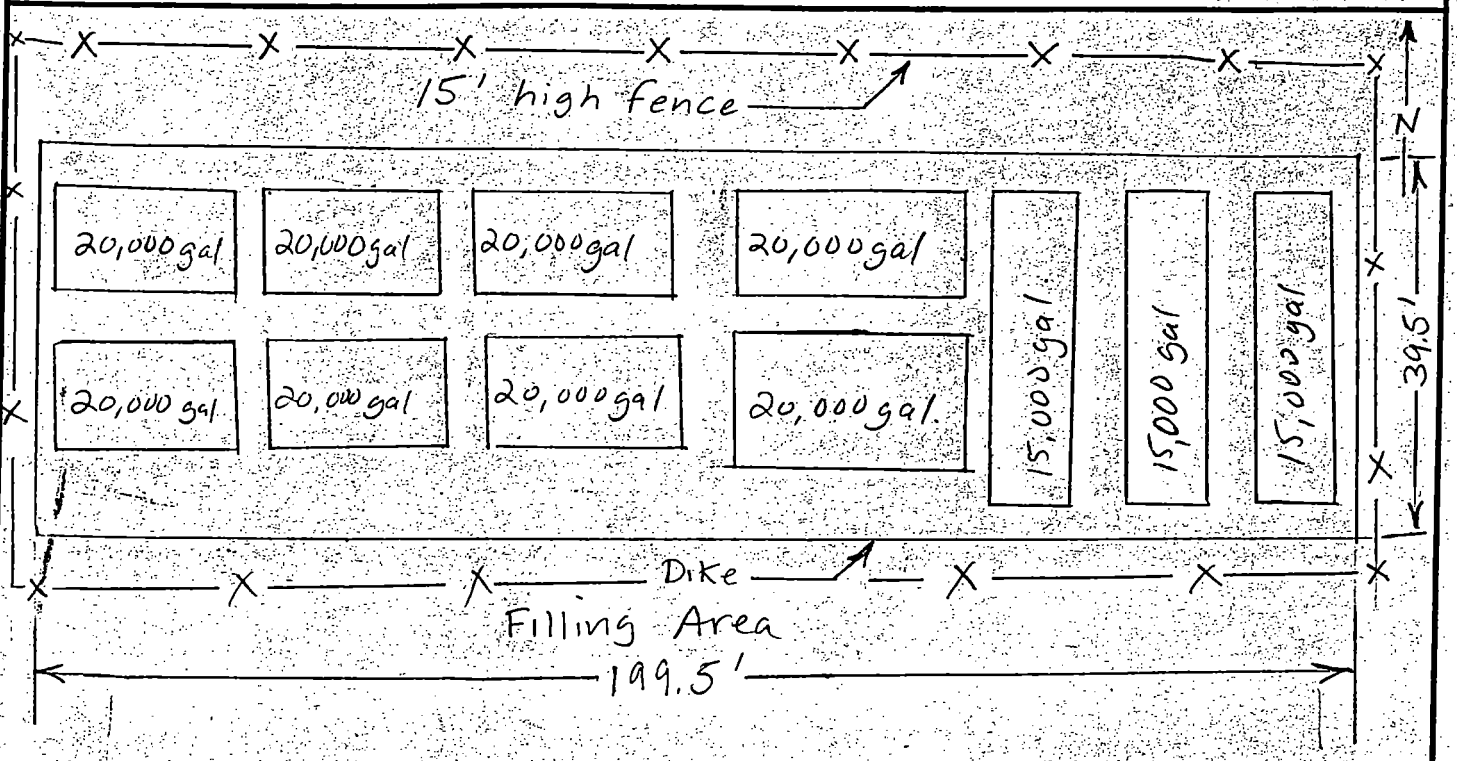
4) The spill notification list did not specify the name or the telephone number of the individuals to be contacted in the event of a spill.

5) The facilities existing countermeasures presently in place to prevent oil from reaching a waterway should be reviewed. An area of concern is the lack of protection of the tank fill ports at the south truck unloading pad. Installation of an

approved device to prevent trucks from accidentally colliding into the tank fill ports is recommended.

C. DETAILED SPCC DOCUMENTATION

6. FIELD DRAWINGS (Attach more sheets if needed, and show north arrow of other orientation)



Largest tank is 20,000 gal.

Dike height is 2'7"

Road / Lot

Go-Jo Processing facility

Outside Containment Area

Not to Scale

FACILITY	INSPECTION DATE
Go-Jo Industries	March 3, 1992

INSPECTOR
Anne Busher and George Albertson, Ecology and Environment, Region V TAT

CALCULATION OF VOLUME OF SECONDARY CONTAINMENT

Name of Facility: Go-Jo Industries (outside dike)

	Area:	1	2	3	4
Volume of Largest Tank (gal):		20,000			
Dike Measurements:	**Area**	**1**	**2**	**3**	**4**
Height:		2.6 ft.			
Length:		199.5 ft.			
Width:		39.5 ft.			

V (gal) = H x L x W x 7.48 gal 1 ft^3

= 2.6 ft. x 199.5 ft. x 39.5 ft. x 7.48 gal/ft^3

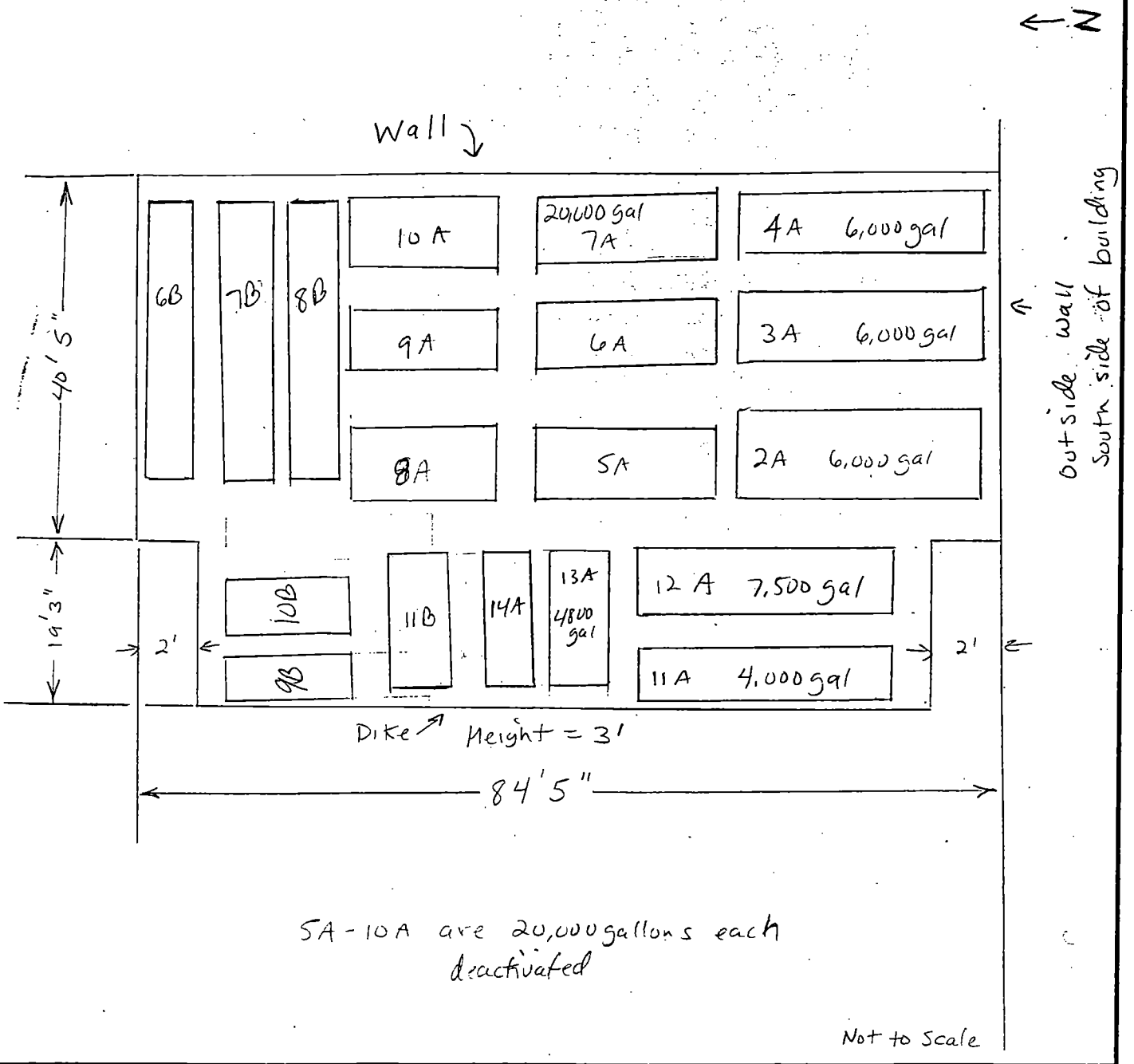
= 153,255 gallons

Dike will contain contents of largest tank.

C. DETAILED SPCC DOCUMENTATION

6. FIELD DRAWINGS (Attach more sheets if needed, and show north arrow of other orientation)

Indoor Containment Area #1



5A - 10A are 20,000 gallons each
deactivated

Not to Scale

FACILITY	INSPECTION DATE
Go-Jo Industries	March 3, 1992

INSPECTOR
Anne Busher and George Albertson, Ecology and Environment, Region V TAT

CALCULATION OF VOLUME OF SECONDARY CONTAINMENT

Name of Facility: Go-Jo Industries (Indoor containment area #1)

Area:	1	2	3	4
Volume of Largest Tank (gal):	7,500			

Dike Measurements: Area	1	2	3	4
Height:	3.0 ft.	3.0 ft.		
Length:	84.5 ft.	80.5 ft.		
Width:	40.5 ft.	19.25 ft.		

V (gal) = H x L x W x 7.48 gal 1 ft^3

= [(3 ft. x 40.5 ft. x 84.5 ft.) + (3 ft. x 80.5 ft. x 19.25 ft.)] x 7.48 gal/ft^3

= 111,568 gallons

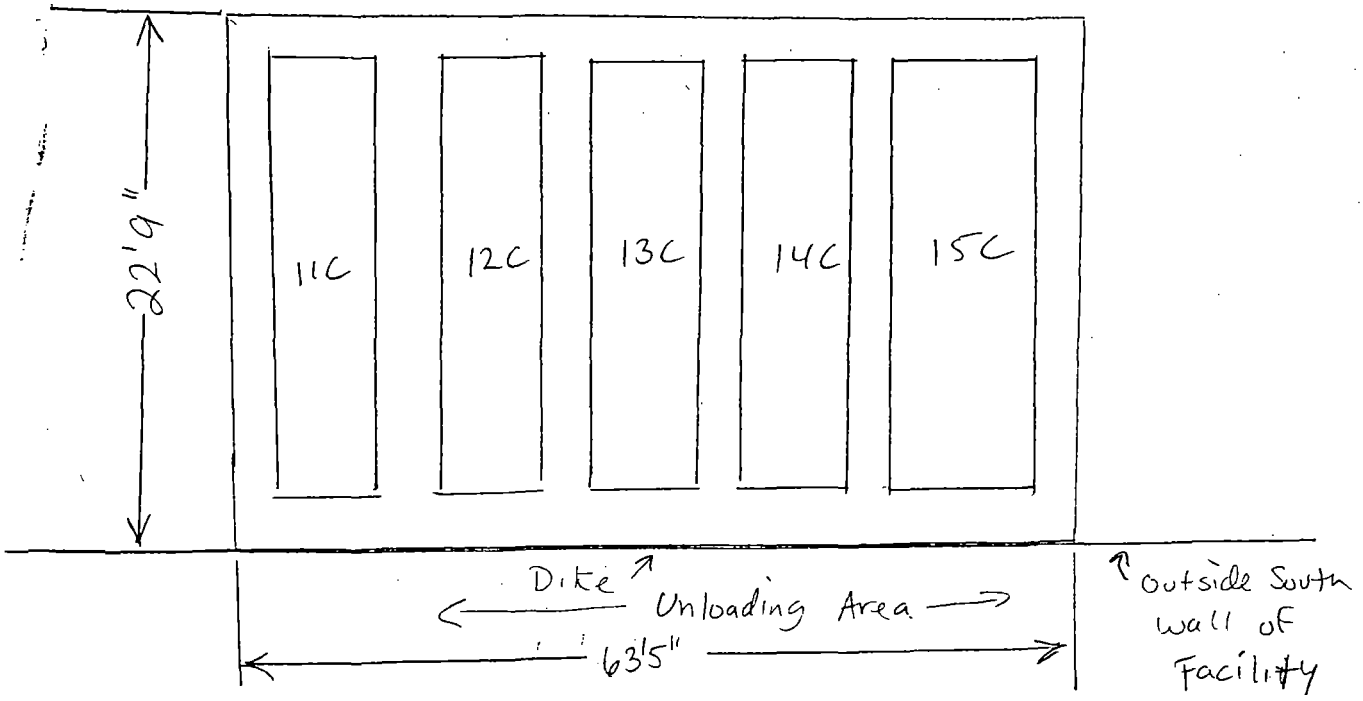
Dike will contain contents of largest tank.

C. DETAILED SPCC DOCUMENTATION

6. FIELD DRAWINGS (Attach more sheets if needed, and show north arrow of other orientation)

Indoor Containment Area # 2

N



Dike Height = 3' 1"

FACILITY	INSPECTION DATE
Go-Jo Industries	March 3, 1992

INSPECTOR
Anne Busher and George Albertson, Ecology and Environment, Region V TAT

CALCULATION OF VOLUME OF SECONDARY CONTAINMENT

Name of Facility: Go-Jo Industries (Indoor containment area #2)

Area:	1	2	3	4
Volume of Largest Tank (gal):	20,000			

Dike Measurements:	**Area**	1	2	3	4
Height:		3 ft.			
Length:		63.5 ft.			
Width:		22.75 ft.			

V (gal) = H x L x W x 7.48 gal 1 ft^3

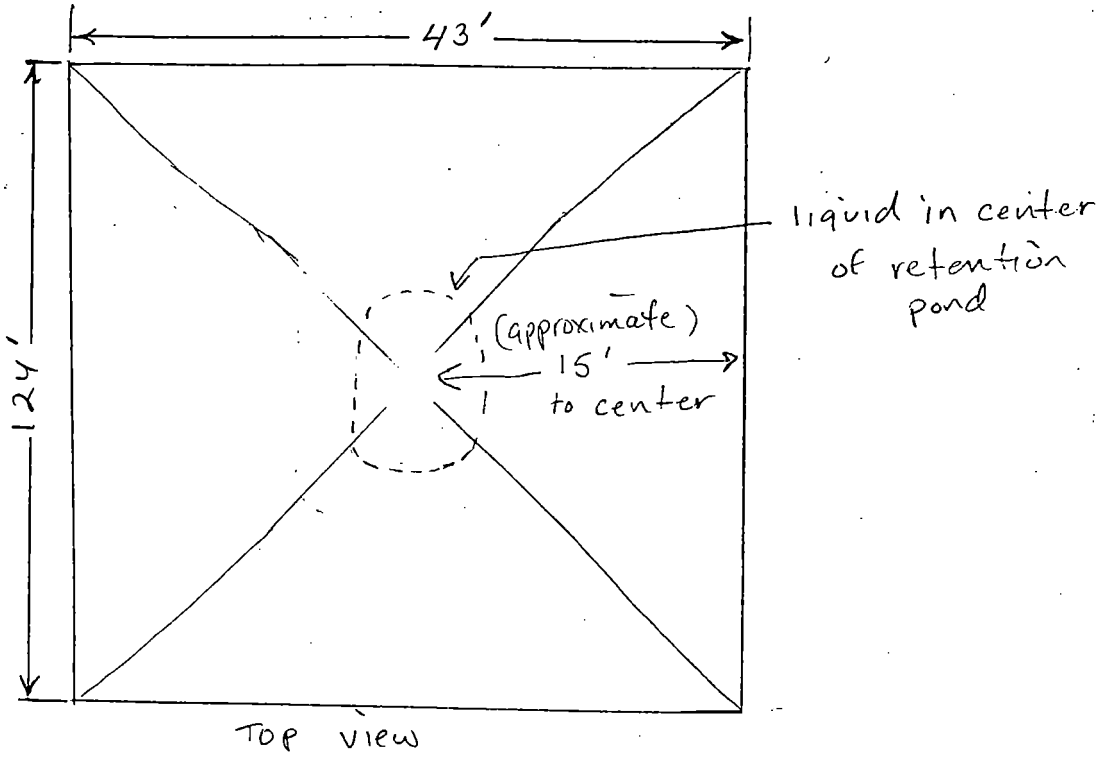
= 3 ft. x 63.5 ft. x 22.75 ft. x 7.48 gal/ft^3

= 32,417 gallons

Dike will contain contents of largest tank.

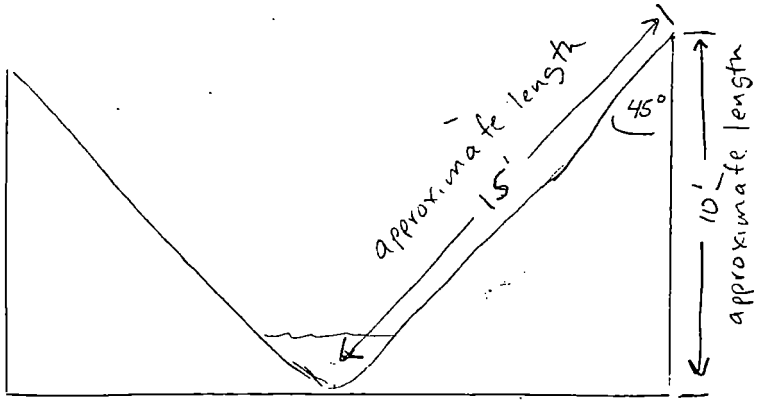
C. DETAILED SPCC DOCUMENTATION

6. FIELD DRAWINGS (Attach more sheets if needed, and show north arrow of other orientation)



Top view

Retention pond



side view (cutaway view)

Not to Scale

FACILITY	INSPECTION DATE
Go-Jo Industries	March 3, 1992

INSPECTOR
Anne Busher and George Albertson, Ecology and Environment, Region V TAT

CALCULATION OF VOLUME OF SECONDARY CONTAINMENT

Name of Facility:

	Area:	1	2	3	4
Volume of Largest Tank (gal):		20,000 gal.			
Dike Measurements:	**Area**	**1**	**2**	**3**	**4**
Height:		10 ft.			
Length:		124 ft.			
Width:		43 ft.			

V (gal) = H x L x W x 7.48 gal 1 ft^3

Volume of retention pond = $\frac{1}{2}$ x H x L x W x 7.48 gal/ft^3

= $\frac{1}{2}$ x 10 ft. x 124 ft. x 43 ft. x 7.48 gal/ft^3

= 199,417 gallons

Retention pond will contain volume of largest storage tank

C. DETAILED SPCC DOCUMENTATION

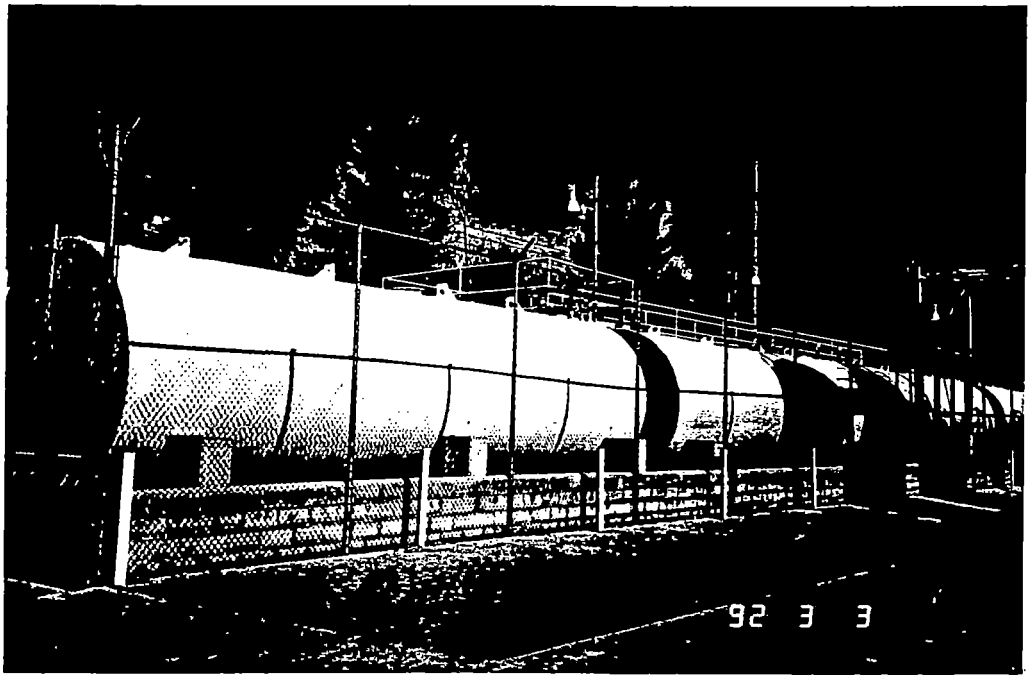
7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Outdoor containment area; dike measures 39.5' x 199.5' x 2'7"

FACILITY
Go-Jo Industries

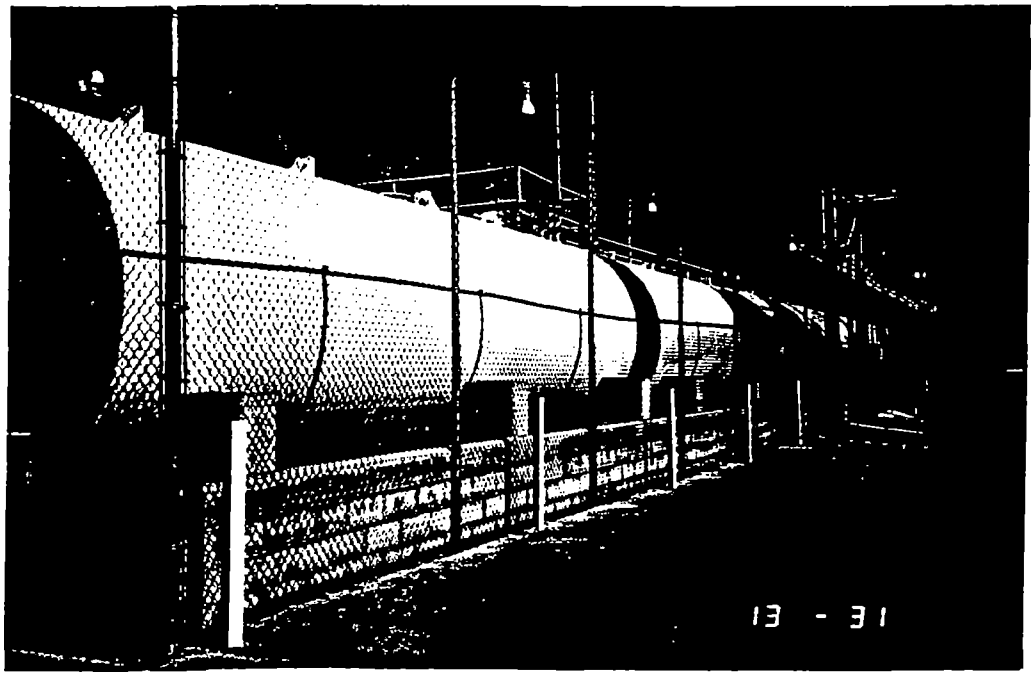
PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1320	Northeast	Olympus 35 mm	35 mm	



C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)					
SUBJECT Outdoor containment area on north side of facility, front view					
FACILITY Go-Jo Industries					
PHOTOGRAPHER Anne Busher				**WITNESSES** George Albertson	
DATE March 3, 1991	**TIME** 1331	**DIRECTION** East	**CAMERA** Olympus 35 mm	**FILM** 35 mm	**ATTACHMENTS**



C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Outdoor containment area on north side of facility, side view

FACILITY
Go-Jo Industries

PHOTOGRAPHER				WITNESSES	
Anne Busher				George Albertson	
DATE	**TIME**	**DIRECTION**	**CAMERA**	**FILM**	**ATTACHMENTS**
March 3, 1991	1331	East	Olympus 35 mm	35 mm	

C. DETAILED SPCC DOCUMENTATION

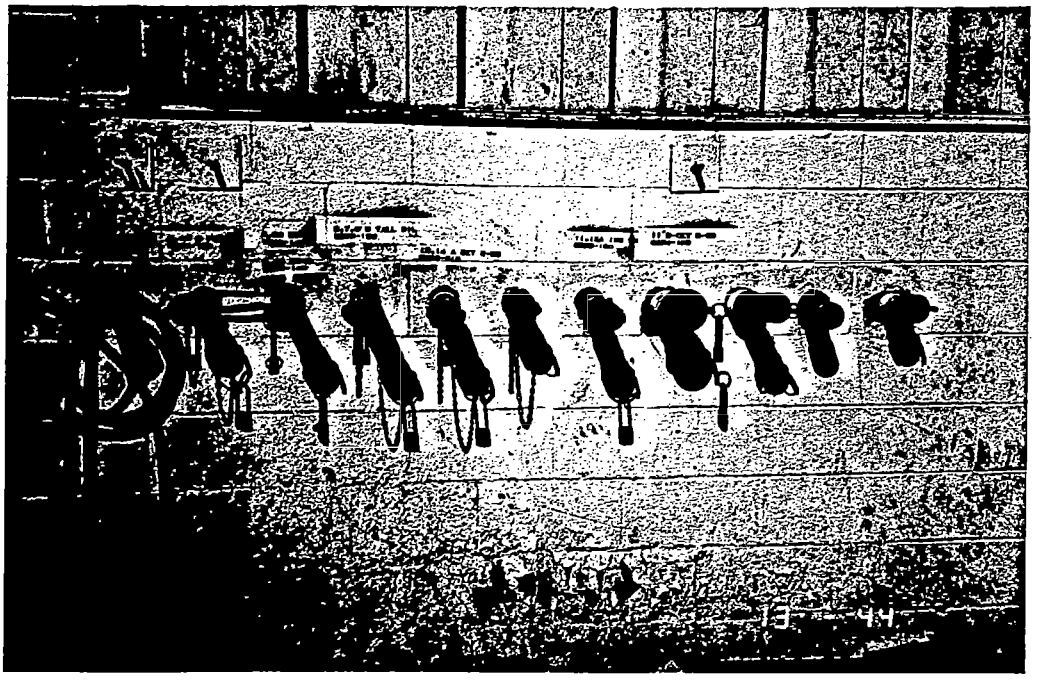
7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Filling station to indoor containment tanks 2A, 3A, 11A, 12A, 13A, 14A, 6B, 7B, 8B, 9B, 10B and 11B, south side of facility

FACILITY
Go-Jo Industries

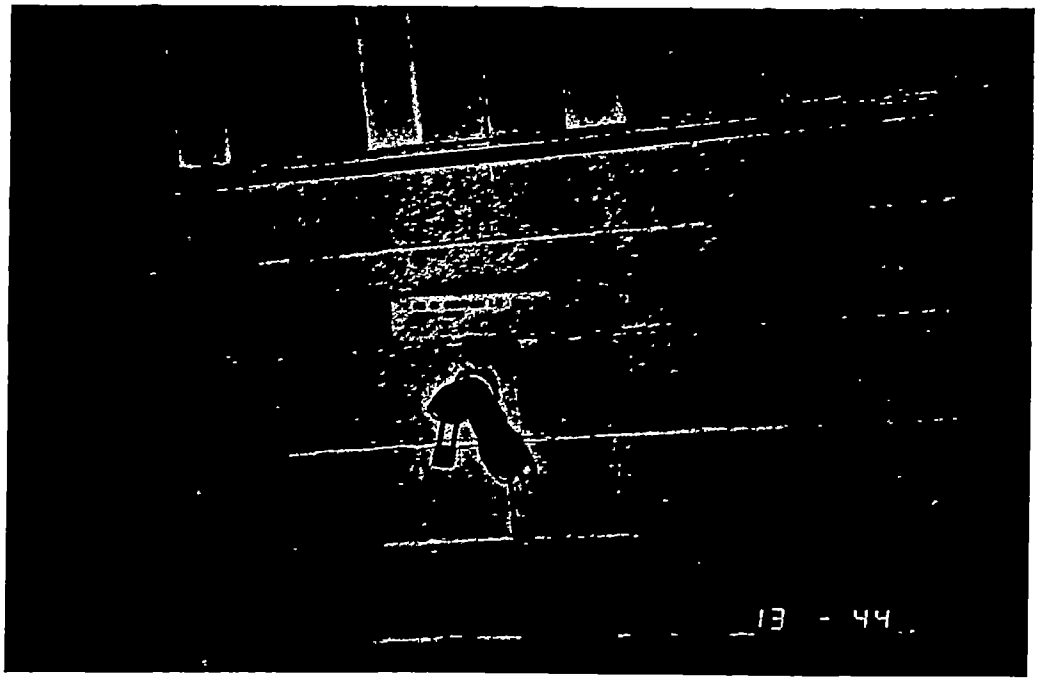
PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1344	North	Olympus 35 mm	35 mm	



C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)					
SUBJECT Filling station to indoor containment tank 15C, on south side of facility					
FACILITY Go-Jo Industries					
PHOTOGRAPHER Anne Busher				**WITNESSES** George Albertson	
DATE March 3, 1991	**TIME** 1344	**DIRECTION** North	**CAMERA** Olympus 35 mm	**FILM** 35 mm	**ATTACHMENTS**



C. DETAILED SPCC DOCUMENTATION

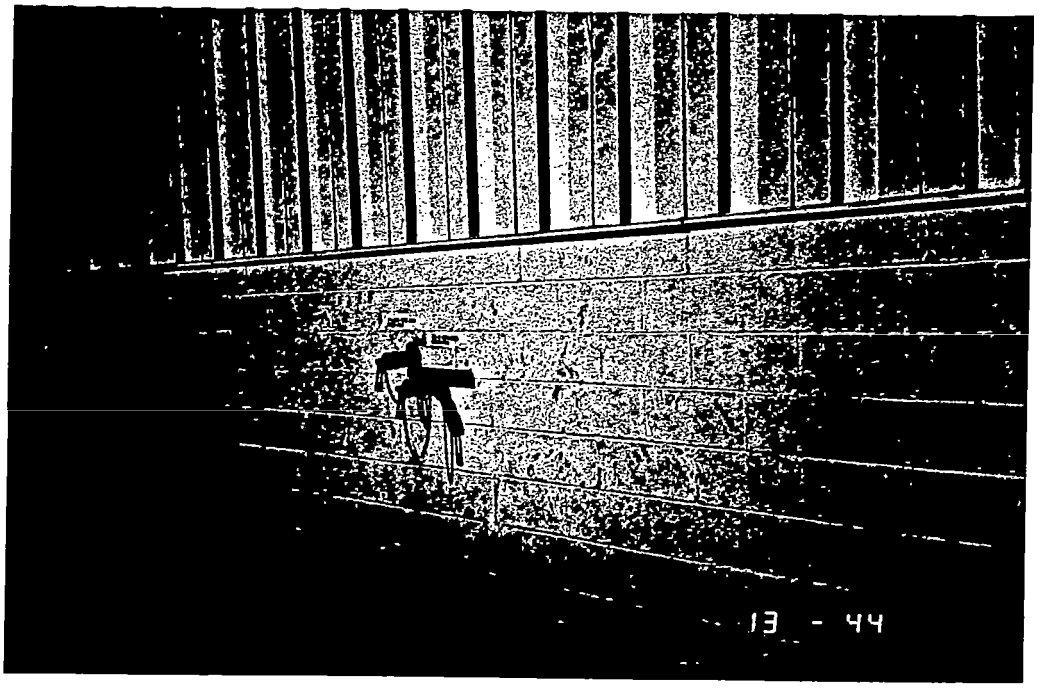
7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Filling station to indoor containment tanks 11C, 12C and 13C, on south side of facility

FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1344	North	Olympus 35 mm	35 mm	



C. DETAILED SPCC DOCUMENTATION

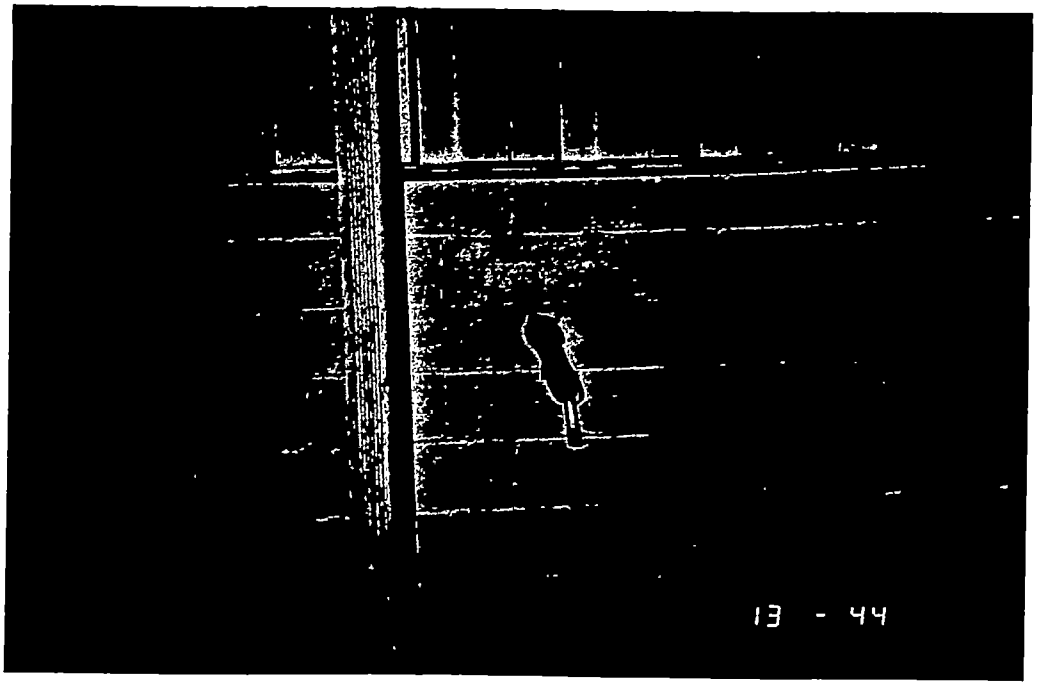
7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Filling station to indoor containment tank 14C, on south side of facility

FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1344	North	Olympus 35 mm	35 mm	



C. DETAILED SPCC DOCUMENTATION

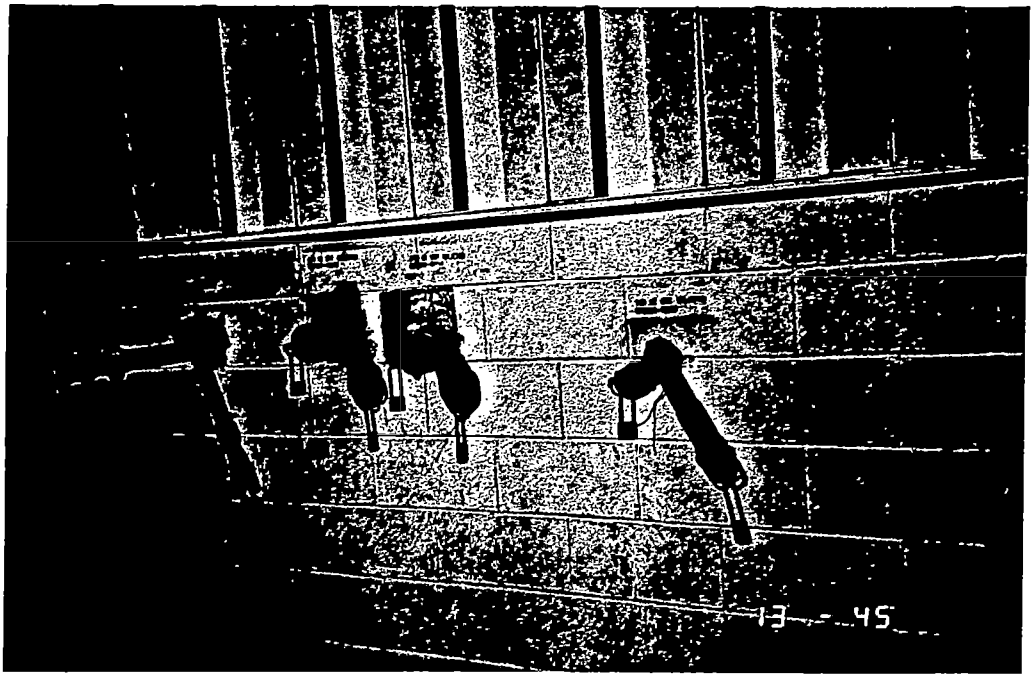
7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Filling station to indoor containment tanks 16C, 17C and 18C on south side of facility

FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1345	North	Olympus 35 mm	35 mm	



C. DETAILED SPCC DOCUMENTATION

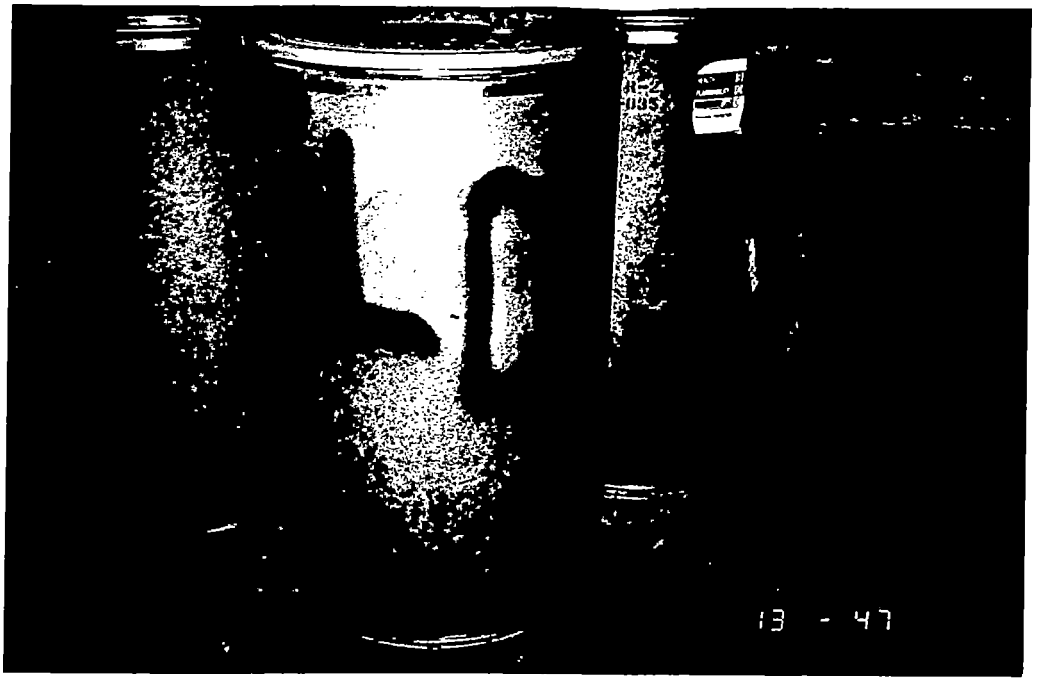
7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Oil-absorbing materials storage area, inside building on south side of facility

FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1347	Southeast	Olympus 35 mm	35 mm	



C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Shut-off valves for outside filling station, on south side of interior of building

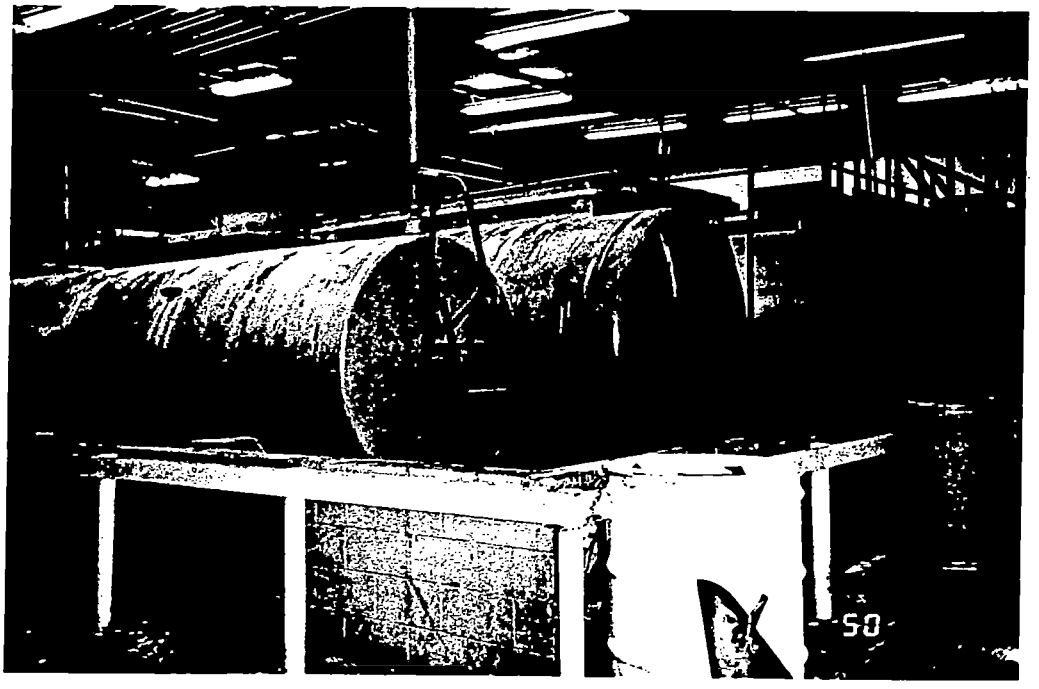
FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1348	Southeast	Olympus 35 mm	35 mm	

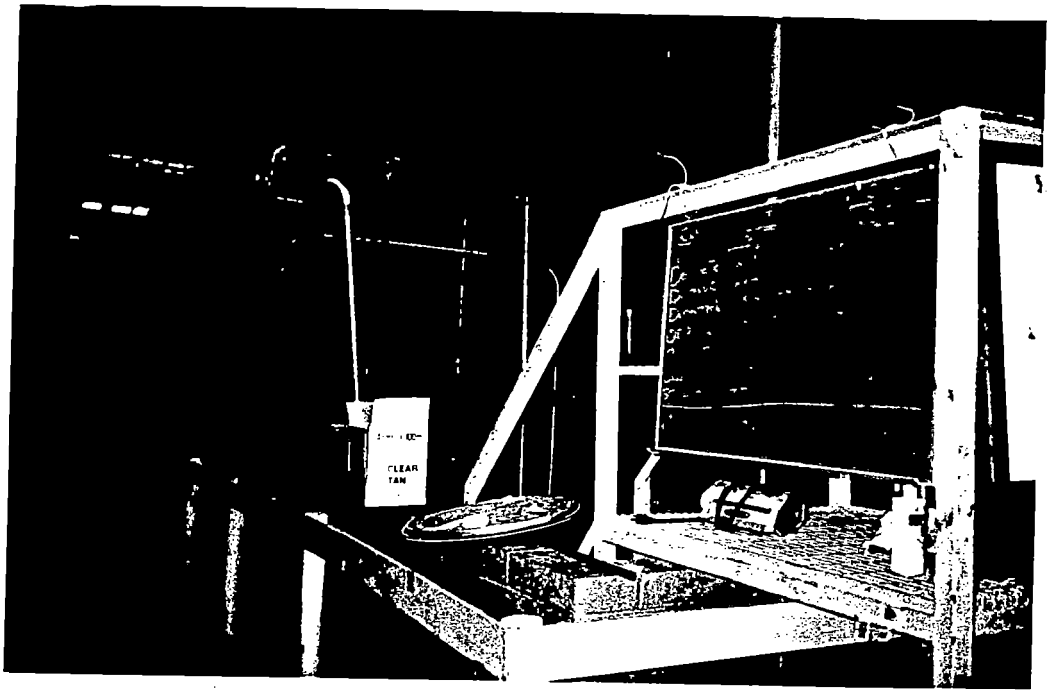
C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)					
SUBJECT Indoor diking around raw materials storage tanks					
FACILITY Go-Jo Industries					
PHOTOGRAPHER Anne Busher				**WITNESSES** George Albertson	
DATE March 3, 1991	**TIME** 1350	**DIRECTION** Northeast	**CAMERA** Olympus 35 mm	**FILM** 35 mm	**ATTACHMENTS**



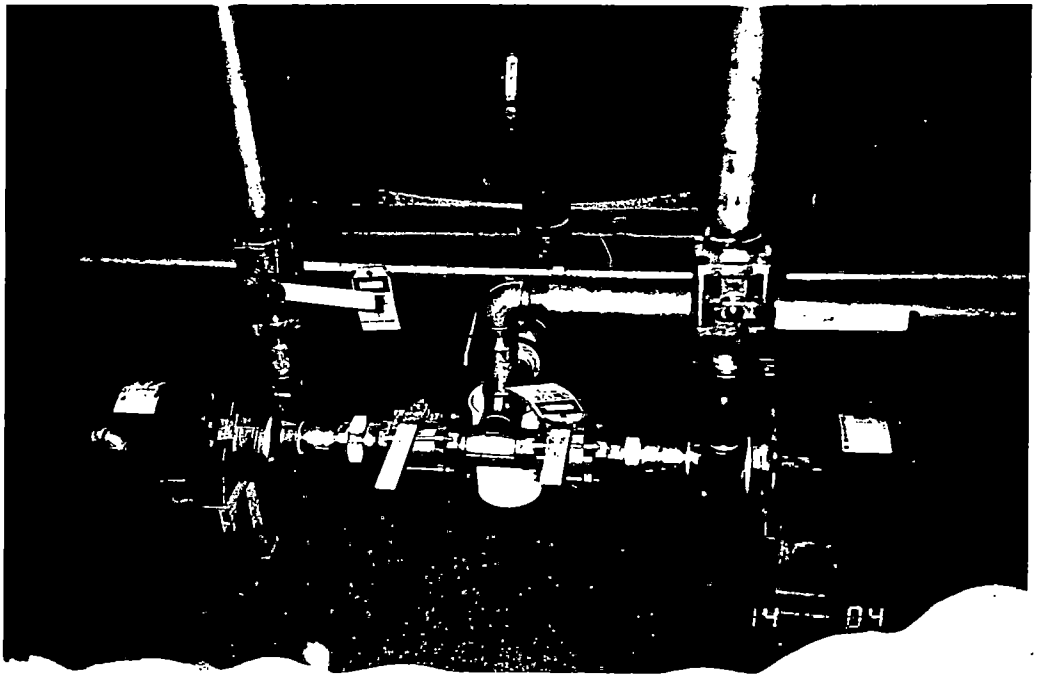
C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)					
SUBJECT Indoor diking around raw materials storage tanks					
FACILITY Go-Jo Industries					
PHOTOGRAPHER Anne Busher				**WITNESSES** George Albertson	
DATE March 3, 1991	**TIME** 1350	**DIRECTION** North	**CAMERA** Olympus 35 mm	**FILM** 35 mm	**ATTACHMENTS**



C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)					
SUBJECT Shut-off valves to indoor raw materials storage tank; piping is inside dike area					
FACILITY Go-Jo Industries					
PHOTOGRAPHER Anne Busher				**WITNESSES** George Albertson	
DATE March 3, 1991	**TIME** 1404	**DIRECTION** East	**CAMERA** Olympus 35 mm	**FILM** 35 mm	**ATTACHMENTS**



C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Sewer line leading to unnamed tributary which leads to Mud Brook and wetlands

FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1420	Southeast	Olympus 35 mm	35 mm	

C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Unnamed tributary to Mud Brook

FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1420	East	Olympus 35 mm	35 mm	

C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)

SUBJECT
Unnamed tributary to Mud Brook

FACILITY
Go-Jo Industries

PHOTOGRAPHER	WITNESSES
Anne Busher	George Albertson

DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS
March 3, 1991	1420	South	Olympus 35 mm	35 mm